

EXHIBIT A

Ryan Quarles
January 31, 2022

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

RYAN QUARLES,	:	No. 21-2813
	:	
Plaintiff,	:	
	:	
vs.	:	
	:	
COMMISSIONER DANIELLE OUTLAW,	:	
Et al,	:	
	:	
Defendants.	:	

- - -

Monday, January 31, 2022

- - -

Videoconference deposition of RYAN
QUARLES was taken, pursuant to notice, before
Kathryn Doyle, a Notary Public of the Commonwealth
of Pennsylvania, on the above date, commencing at
2:02 p.m.

- - -

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<p>1 date on February -- I believe February -- I don't 2 remember the exact date, but I had a court date and 3 I came up here. It was in February, though, early 4 February. 5 Q Of 2020? 6 A Yeah. 7 And then I turned around and I had 8 another court date like two weeks later, so I just 9 stayed up here with family. 10 Q And what was the case for that you had a 11 court date? 12 A For the case that the lawsuit is for now. 13 Q Okay. So let me try to clear that up. 14 The incident that we're here for 15 today was your February 2020 arrest, by Officer 16 Ponente and Officer Rozman, right? 17 A Yes. 18 Q Okay. So I'm asking prior to that arrest, 19 why were you in Philadelphia? 20 A I was visiting family. 21 Q Okay. 22 A All of my family lives here, so I just 23 come -- I visit family and then go back home like a 24 regular person does.</p>	<p>1 THE WITNESS: Oh. I got arrested in -- 2 yeah. I got arrested in February, so -- I 3 wasn't in Philadelphia in January. I came in 4 February. So I came here to visit my family in 5 February, so -- before that, I was in Georgia, 6 though. So I wasn't really here in January. I 7 was here in February. 8 BY MS. ZABEL: 9 Q Okay. How long were you in Philadelphia 10 before you were arrested by Officers Ponente and 11 Rozman? 12 A Maybe a weekend. 13 Q How long were you planning on staying to 14 visit your family? 15 A No later than like a week or so. I know I 16 had like a week off from work, so I didn't... 17 Q Okay. You were arrested by Officers 18 Ponente and Rozman on February 3, 2020. So that's a 19 Friday -- 20 A All right. 21 Q -- if I'm looking at my calendar. 22 Does that refresh your recollection 23 at all about when you arrived in Philadelphia? 24 A Oh, okay. So it might have been late</p>
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<p>1 Q Yeah. So when you were visiting family, 2 when did you specifically come up? 3 A I don't remember -- I don't recall what 4 exact days I came up. 5 Q So you were arrested by Officers Ponente 6 and Rozman on February 3, 2020. 7 Did you come up to Philadelphia in 8 January 2020? 9 A No. I wasn't in Philadelphia in January. 10 Q Okay. 11 A I came up February. 12 Q You came up in February. 13 You earlier said: I had a court date 14 in February 2020. 15 A Yeah. 16 Q And I asked what case was that for. 17 A The case that Ponente locked me up for. 18 Q Okay. So -- 19 A I don't know if I'm getting confused. I 20 don't know. I'm kind of confused, though. I 21 guess -- you said February? Yeah, February 2020. 22 MR. BELL: I think she's asking prior to 23 your encounter with Officers Ponente and 24 Rozman, when did you come to Philadelphia?</p>	<p>1 January. I'm sorry about that. 2 Q Okay. 3 A Yeah. If I was arrested February 3, it 4 had to be like late January I was here. 5 Q Okay. Where do you stay when you visit 6 family in Philly? 7 A Maybe hotels. Sometimes my mom's house, 8 but I have a lot of siblings, so I hate staying 9 there. 10 Q Do you remember in January 2020 where you 11 stayed? 12 A Yeah. I stayed at my mom's house, I 13 believe -- yeah, I stayed at my mom's house for 14 about a weekend, just visiting. 15 Q And is your mom's address, 1629 West 16 Butler Street? 17 A No. 18 Q Okay. What's your mom's address? 19 A It's 216 Sparks Street. 20 Q Okay. Who lives at 1629 West Butler 21 Street? 22 A That's my old address when I was going to 23 high school -- I don't know where that address came 24 from, though.</p>

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<p>1 Q So you haven't lived at that Butler Street 2 address since you were, like, in high school? 3 A Yeah, yeah. 4 Q Do you have a driver's license? 5 A Yeah. 6 Q And where is the driver's license from? 7 Georgia or Pennsylvania? 8 A Georgia. 9 Q Are you registered to vote? 10 A Yeah. 11 Q Do you know where you're registered to 12 vote, what state? 13 A Georgia. 14 Q I saw in your responses to discovery that 15 you previously were a cable repair technician and 16 installer; is that right? 17 A Yes. 18 Q Okay. For what years did you do that job? 19 A 2017, 2018, 2019 -- for about three years. 20 Q What company did you work for? 21 A Xfinity. 22 Q Where did you work? 23 A Xfinity. 24 Q I'm sorry. That was a poorly worded</p>	<p>1 A Yes. 2 MR. BELL: You can answer that, 3 Mr. Quarles. 4 THE WITNESS: Yes. 5 BY MS. ZABEL: 6 Q How many times? 7 A Once, I believe -- once. 8 Q When was that? 9 A 2018. 10 Q I'm going to read to you some of the 11 charges from that, and I just want you to confirm 12 this is the same action that we're talking about. I 13 have a docket that says in February 2018, you were 14 charged with -- not convicted, but charged with: 15 Armed robbery, aggravated assault with a deadly 16 weapon, possession of a firearm during commission of 17 a felony, financial transaction card fraud, 18 financial identity fraud, and I believe that's it. 19 Is that the same matter that we're 20 talking about? 21 A Yep. 22 Q Okay. When you were arrested for that 23 February 2018 -- when you were arrested in 24 February 2018, did you spend any time incarcerated?</p>
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<p>1 question. 2 I meant where was your job located? 3 A It was a contracting company in Tucker, 4 Georgia. 5 Q And why did you stop working that job? 6 A Because I got arrested and I was held 7 over, so I kind of lost my job. 8 Q You got arrested in Georgia? 9 A No. I had gotten arrested in Philadelphia 10 as I was visiting family. 11 Q Is that a different arrest than we're here 12 for today, the February 2020 arrest? 13 A No. It's the same one. 14 Q So as of -- you just told me you worked 15 this job 2017 to 2019. 16 As of January 2020, did you still 17 have a job at Xfinity? 18 A Yeah, yeah. 19 Q Okay. Have you been arrested in Georgia 20 before? 21 A I don't want to talk about an open matter. 22 Q So this question isn't implicating any of 23 your Fifth Amendments rights. It's simply asking if 24 you've been arrested in Georgia before?</p>	<p>1 A Yeah. About -- maybe a month. 2 Q Where were you incarcerated? 3 A Fulton County. 4 Q And how were you released? 5 A They let me go for signature bond. 6 Q That matter is still pending; is that 7 correct? 8 A Yeah. I thought it was over until I got 9 arrested this time, and then somehow it's just open 10 again. So I don't know what's going on with that. 11 Q Why did you think it was over? 12 A I mean, it got like -- I guess, like, I 13 don't know. It was like -- it disappeared for a 14 second. I couldn't, like, look up anything from it 15 or anything from 2020 until now. It was like closed 16 or something -- not closed, but it was like -- I 17 couldn't click on anything. I didn't have a warrant 18 or anything, so I thought it went away. 19 Q Do you have a lawyer for that case? 20 A No. 21 Q Is anyone from the Public Defender's 22 Office representing you? 23 A I don't know who the public defender is 24 right about now. I think -- last time I checked,</p>

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<p>1 they switched it, so I wouldn't even, like, give you</p> <p>2 a name and that would be the wrong name.</p> <p>3 Q Have you been contacted by any public</p> <p>4 defender representing you about the case?</p> <p>5 A No.</p> <p>6 Q Did you ever retain a private attorney for</p> <p>7 that case?</p> <p>8 MR. BELL: I'm going to object on</p> <p>9 relevance at this point.</p> <p>10 You can answer the question.</p> <p>11 THE WITNESS: Can you repeat the question?</p> <p>12 BY MS. ZABEL:</p> <p>13 Q Did you retain a private attorney for that</p> <p>14 case?</p> <p>15 A No.</p> <p>16 Q I'm just looking at a name and you can</p> <p>17 tell me if this sounds familiar to you at all,</p> <p>18 Meghan Callier.</p> <p>19 Do you recall her being your</p> <p>20 attorney?</p> <p>21 A She's not a private attorney, though.</p> <p>22 She's a court-appointed attorney.</p> <p>23 Q Okay. Were you aware when you signed for</p> <p>24 your bond, as you say -- you said you did a</p>	<p>1 Q Were you aware that the armed robbery</p> <p>2 charge against you was a felony charge?</p> <p>3 MR. BELL: Plead the Fifth.</p> <p>4 THE WITNESS: I'll plead the Fifth.</p> <p>5 BY MS. ZABEL:</p> <p>6 Q Are you aware that the aggravated assault</p> <p>7 with a deadly weapon charge against you was a felony</p> <p>8 charge?</p> <p>9 A Plead the Fifth.</p> <p>10 Q Were you aware in signing your signature</p> <p>11 bond that you were not permitted to carry a firearm?</p> <p>12 A I plead the Fifth.</p> <p>13 Q Can you tell me the details that led to</p> <p>14 your arrest in Georgia for the charges that we were</p> <p>15 discussing?</p> <p>16 MR. BELL: Plead the Fifth.</p> <p>17 THE WITNESS: Plead the Fifth.</p> <p>18 I told you I didn't want to discuss an</p> <p>19 open matter.</p> <p>20 BY MS. ZABEL:</p> <p>21 Q Is it your understanding that you're being</p> <p>22 extradited back to Georgia at some point for these</p> <p>23 charges?</p> <p>24 A I plead the Fifth.</p>
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<p>1 signature bond -- that you weren't allowed to leave</p> <p>2 the state?</p> <p>3 MR. BELL: Objection. Relevance -- don't</p> <p>4 answer that, actually. That's a Fifth</p> <p>5 Amendment issue, potentially.</p> <p>6 MS. ZABEL: So you can only make</p> <p>7 objections -- speaking objections as to the</p> <p>8 form of the question, not as to relevance.</p> <p>9 Having said that, if you're instructing</p> <p>10 your client to plead the Fifth, that is clearly</p> <p>11 your right to do so and his right to answer</p> <p>12 that way.</p> <p>13 So are you instructing him to plead the</p> <p>14 Fifth?</p> <p>15 MR. BELL: What's the question, again?</p> <p>16 MS. ZABEL: Actually, Katie, can you read</p> <p>17 that back?</p> <p>18 - - - - -</p> <p>19 (Whereupon the court reporter read back the last</p> <p>20 question.)</p> <p>21 - - - - -</p> <p>22 MR. BELL: Plead the Fifth, Quarles.</p> <p>23 THE WITNESS: I plead the Fifth.</p> <p>24 BY MS. ZABEL:</p>	<p>1 Q Do you have any information about when you</p> <p>2 will be extradited to Georgia?</p> <p>3 A I'm not sure. I really don't know what's</p> <p>4 going on, here. I don't even know why I'm being</p> <p>5 held. I probably should have been released from</p> <p>6 here.</p> <p>7 Q Okay. So let's talk then about your</p> <p>8 arrest by Officers Ponente and Rozman.</p> <p>9 Can you tell me what you were doing</p> <p>10 on February 3, 2020 prior to being arrested?</p> <p>11 A I was going to get something to eat. I</p> <p>12 was riding with a friend, and I was just driving.</p> <p>13 And I looked up, and the cops were behind me.</p> <p>14 Q Was your friend Nyseem(ph) Smith?</p> <p>15 A Yes.</p> <p>16 Q And you were the driver?</p> <p>17 A Yes.</p> <p>18 Q Were you driving your car or Nyseem's car</p> <p>19 or somebody else's?</p> <p>20 A It was his car.</p> <p>21 Q Why were you driving?</p> <p>22 A I don't know -- because I was driving.</p> <p>23 Q Okay. That's a perfectly fine answer, and</p> <p>24 it's also -- I should have said -- it's perfectly</p>

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<p>1 fine if you don't remember certain questions that 2 I'm going to ask you, too. 3 Okay. So you're driving to get food, 4 and suddenly you realize the cops are behind you; is 5 that right? 6 A Yes. 7 Q Okay. Where were you when you realized 8 that the police were behind you? 9 A It was like on Chew Ave., so in between -- 10 maybe like Chew and Locust area -- Chew and Locust 11 Street. 12 Q And what made you realize that the police 13 were behind you? Did they have their sirens on or 14 their lights or anything like that? 15 A I just looked in my mirror. They didn't 16 have their lights on. They were just behind me, 17 so... 18 Q Okay. So what do you do when you realize 19 that they are behind you? 20 A Just continue driving, as I was doing. 21 Q At any point, did you disregard a stop 22 sign? 23 A No. 24 Q At any point, did you fail to use your</p>	<p>1 Q All right. Once the police put on their 2 lights and sirens, what do you do? 3 A I pull to a dead end so I wouldn't block 4 traffic and stuff. 5 Q Where was that located? 6 A On Gray Street right before Chelten 7 Avenue? 8 Q All right. What happens next? 9 A Well, I came to the dead end. I stopped. 10 I kind of like looked out of my mirror, and he, 11 like, jumped out of car with his gun out and stuff. 12 Q When you say he, the two officers who 13 arrested you, one was a female and one was a male. 14 So are you referring to Officer Ponente when you 15 say: He jumped out? 16 A Yes. 17 Q Okay. So Officer Ponente jumps out, you 18 said, with a gun drawn; is that right? 19 A Yes. She did the same thing, too, though. 20 Q Okay. And you saw all of this from your 21 mirror? 22 A Yeah. 23 Q Okay. What happens next? 24 A They were just yelling and yelling and</p>
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<p>1 turn signal while making a turn on to -- at the 2 intersection of 21st Street and Nedro Ave -- I never 3 know how to say that. 4 A No. 5 Q Okay. 6 A In fact, the cop wasn't even behind me 7 until I got to Chew and Locust. 8 Q Did you ever try to avoid the police? 9 A No. 10 Q Did you ever increase the car's speed once 11 you saw the police? 12 A No. 13 Q At any point, do the police put on their 14 lights and sirens? 15 A Repeat that again. Sorry. 16 Q At any point, did the police put on their 17 lights and sirens on their vehicle? 18 A Maybe like a block away from Locust, so 19 whatever that cut block is right there in between 20 Locust and Gray. 21 Q How long after you first noticed the 22 police behind you did they activate their lights? 23 A Maybe about 30 seconds, maybe -- to a 24 minute, 30 to a minute.</p>	<p>1 yelling and approaching the car, as well. 2 Q Did the officers order you out of the car? 3 A Yeah. 4 Q What did they say? 5 A Get the F out of the car. Don't move. 6 Put your hands up -- stuff like that. 7 So I got out of the car. I complied 8 with them. I put my hands up, and I took a couple 9 steps backwards towards them. And I got down on my 10 knee. That's it. I was, like, complying with them, 11 also. 12 Q At the time you were stopped, did you have 13 a firearm on your person? 14 A Yeah. 15 Q Where was it located? 16 A In my pocket. 17 Q Which pocket, if you remember? 18 A I believe -- probably my right one. 19 Q Did you tell the officers you had a gun on 20 you? 21 A Yeah. I told them, and I told them I also 22 had my license to carry. 23 Q When did you tell them that for the first 24 time?</p>

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<p>1 A When he was approaching me. 2 Q Did you tell them you had a firearm on you 3 in response to a question that they asked or did you 4 tell them proactively? 5 A Question. 6 Q What did they say, if you remember? 7 A He asked me something -- I can't remember, 8 but I did tell them I had a firearm and a license to 9 carry. 10 Q What happens after you tell them that you 11 have a firearm on you? 12 A They took the firearm. They took the 13 license and placed me under arrest -- or detained 14 me. 15 Q Did he put handcuffs on you? 16 A Yeah. 17 Q And where did he put you? 18 A In the back of a cop car. 19 Q And where was your friend at this time? 20 A He got put in a separate cop car, I 21 believe. 22 Q Okay. The firearm that they recovered 23 from you, was that your firearm? 24 A It was a friend's.</p>	<p>1 BY MS. ZABEL: 2 Q Why did you ask Dionte for permission to 3 have his gun? 4 A I don't know. I just said: Can I hold 5 it? He said: Yeah. He gave me permission to. 6 Q Was it for protection? 7 A It's always for protection. 8 Q At this point in time, in February 2020, 9 did you own any firearms? 10 A Yeah. 11 Q How many -- 12 MR. BELL: Objection. Relevance. 13 Objection. Relevance. 14 Answer the question, if you can recall. 15 BY MS. ZABEL: 16 Q How many firearms did you own? 17 A One. 18 Q Did you purchase it in Georgia? 19 A Yeah. 20 Q Did you bring that firearm with you when 21 you came up to Philadelphia in January or 22 February 2020? 23 A No. 24 Q Why not?</p>
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<p>1 Q And who was the friend? 2 A I'd like to not disclose that information. 3 Q Okay. You have to, because you're under 4 oath and your lawsuit is about this arrest. 5 MR. BELL: If you recall, Mr. Quarles, 6 answer the question. 7 THE WITNESS: I don't recall. I don't 8 recall. 9 BY MS. ZABEL: 10 Q You don't remember your friend's name? 11 A I remember his first name, but I don't 12 remember his last name. I don't want to give you 13 the wrong name and then -- it's like lying if you 14 give you the wrong name, right? 15 Q What's his first name? 16 A Dionte, D-I-O-N-T-E. 17 Q And why did you have Dionte's gun on you? 18 A He gave me permission to have it. 19 Q Why did you ask for his permission to have 20 his gun? 21 MR. BELL: Objection. Relevance. Answer 22 the question. 23 THE WITNESS: Can you repeat your 24 question?</p>	<p>1 A Because I didn't. 2 Q But then you asked your friend, Dionte, 3 for his gun when you were in Philadelphia, right? 4 A I mean, he's not from Philadelphia, so -- 5 I didn't ask anyone in Philadelphia for a gun, just 6 to be clear. 7 Q Okay. So where is Dionte from? 8 A Georgia. 9 Q Okay. So why did you bring Dionte's gun 10 to Philadelphia as opposed to your own gun? 11 A Because he gave me permission to. 12 Q I understand he gave you permission. 13 Why did you choose to take his gun 14 over your own gun? 15 MR. BELL: Objection. Relevance. 16 Answer the question. 17 THE WITNESS: I mean, there's nothing 18 saying I can't do that or saying it's illegal 19 or something. 20 BY MS. ZABEL: 21 Q No. The question is why you preferred to 22 take one gun over another? 23 A I mean, does that really matter why? 24 Q Yeah. Because part of the suit that you</p>

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